

## **Exhibit B**

**DECLARATION OF HUI CHANG IN FURTHER SUPPORT OF THE MOTION OF  
THE TESLA INVESTOR GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

I, Hui Chang, declare as follows:

I am an attorney at Labaton Sucharow LLP, proposed Co-Lead Counsel for the Class. I submit this declaration in further support of the motion filed by Andrew E. Left, PROtecto Informatikai Szolgáltató Korlátolt Felelősségű Társaság, Thierry Boutin, Dr. Abrar Shirazi, and Vilas Capital Management, LLC (collectively, the “Tesla Investor Group”). See ECF No. 47.

I am competent to translate from Portuguese into English, and certify that the excerpt translations of *Opportunity Gestão de Investimentos e Recursos Ltda – Instrução CVM* and *Justiça nega habeas corpus para Verônica Dantas* referenced in the Memorandum of Law in Further Support of the Motion of the Tesla Investor Group, at 4 n.7 and 6 n.18, are true and accurate to the best of my abilities.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of October, 2018, at New York, New York.

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*/s/ Hui Chang*  
Hui Chang